

1 ANGELA H. DOWS, ESQ.
2 Nevada Bar No. 10339
3 CORY READE DOWS & SHAFER
4 1333 North Buffalo Drive, Suite 210
5 Las Vegas, Nevada 89128
Telephone: (702) 794-4411
Email: adows@crdslaw.com
Attorney for Defendant
DONNIE BRYANT

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

Case No. 2:06-cr-234-GMN-GWF

9 Plaintiff,

**Stipulation to Extend Deadline to File
Reply Brief to Donnie Bryant's Motion
(First Request)**

10 v.

11 DONNIE BRYANT,

12 Defendant.

13 It is hereby stipulated and agreed, by and between Jason M. Frierson, United States
14 Attorney, through Jim W. Fang, Assistant United States Attorney, and Angela H. Dows, Esq.,
15 counsel for defendant Donnie Bryant, that the Defendant's Reply to its Motion/Supplement to
16 Motion to Reduce Sentence under Section 404 of the First Step Act, ECF Nos. 849, 857, currently
17 set for September 22, 2023, be extended until October 13, 2023.

18 1. Bryant filed his Motion *pro se* on July 5, 2023, in which he requested the
19 appointment of counsel to assist him with his Motion. The Court granted the request and
20 appointed counsel. ECF No. 852.

21 2. Thereafter, the Court set new briefing schedule, allowing Bryant's appointed
22 counsel, Angela Dows, to file a supplement to the Motion by August 11, 2023. ECF No. 857.

23 3. The government thereafter filed a response on September 8, 2023. ECF No. 859.

1 4. Via a stipulation of the parties and subsequent order, Defendant's deadline to file
2 a reply is currently on or before September 22, 2023. ECF 856.

3 5. Defendant requests additional time to file a reply in the matter. Without revealing
4 attorney-client privilege, additional time is required for mailed communications to arrive at
5 Defendant's place of incarceration, with an anticipated mailed response from Defendant to
6 defense counsel's office thereto. Due to the time required for mailings to and from a place of
7 incarceration, an additional three weeks from the current due date is requested.

8 6. Defendant thus requests a deadline of October 13, 2023 to file his reply.
9 DATED this 15th day of September, 2023.

10 JASON M. FRIERSON
11 United States Attorney

12 s/ Jim W. Fang
13 JIM W. FANG
14 Assistant United States Attorney
15 *Counsel for the United States*

16 s/ Angela H. Dows
17 ANGELA H. DOWS, ESQ.
18 *Counsel for Defendant Donnie Bryant*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:06-cr-234-GMN-GWF

Plaintiff,

V.

DONNIE BRYANT,

Defendant.

ORDER

Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, IT IS HEREBY ORDERED that Defendant's Reply to its Motion/Supplement to Motion to Reduce Sentence under Section 404 of the First Step Act, ECF Nos. 849, 857, shall be filed and served on or before October 13, 2023.

DATED this 15 day of September, 2023.

**HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE**